

STATEMENT OF BASIS (AI No. 302)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0075213 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: T.T. Barge Services Mile 237, LLC
19368 Highway 36
Covington, Louisiana 70433

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: January 29, 2007

1. PERMIT STATUS

A. Reason For Permit Action:

Permit revocation and reissuance of a current Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. NPDES permit - N/A
NPDES permit effective date: N/A
NPDES permit expiration date: N/A

C. LWDPS permit - (WP1658)
LWDPS permit effective date: March 20, 1993
LWDPS permit expiration date: March 19, 1998

D. LPDES permit - LA0074213
LPDES permit effective date: December 1, 2003
LPDES permit expiration date: November 30, 2008
LPDES permit modification date: December 1, 2006

E. Date Application Received: October 30, 2006 (A request for a major modification was received from the facility to add an outfall for dry dock ballast from Dock #2. Because there is less than two years until expiration of the existing permit, the existing permit will be revoked. This request will be used for issuance of the renewal permit.)

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - barge cleaning and repair facility

T.T. Barge Services Mile 237, LLC is an existing barge cleaning and repair facility. Washwaters generated at the facility include those from the cleaning of edible and inedible oils and products, inorganic products, fertilizer materials, petroleum products and organic products. All waters that come into contact with product residues are pumped to

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holding tanks onboard the double skinned tank barge or the wash water tanks located on the deck barge. The waters are segregated and stored with similar type contact waters. Hazardous wash waters are stored separated from non-hazardous wash waters. The water is then filtered for accumulation and storage prior to treatment or disposal. Both hazardous and non-hazardous waters are transferred to barges and/or tank trucks and moved off-site for proper disposition. **Barge washwaters are not discharged from this facility.**

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: I (downgraded from IV as there is no discharge of barge washwater)
3. Wastewater Type: III
4. SIC code: 4499

C. LOCATION - 5127 River Road, Port Allen, West Baton Rouge Parish
 Latitude 30°30'57", Longitude 90°12'59"

3. OUTFALL INFORMATION

Outfall 004

Discharge Type: treated sanitary wastewater
 Treatment: sewage treatment plant
 Location: at the point of discharge from the sewage treatment plant servicing the repair facility (Latitude 30°30'45", Longitude 91°13'43")
 Flow: 1000 gpd
 Discharge Route: directly to the Mississippi River

Outfall 05A

Discharge Type: incoming ballast from customer barges
 Treatment: none
 Location: at the point of discharge from the customer barges (Latitude 30°31'12", Longitude 91°13'01")
 Flow: intermittent
 Discharge Route: directly to the Mississippi River

Outfall 05B

Discharge Type: maintenance barge ballast water
 Treatment: none
 Location: at the point of discharge from the maintenance barges (Latitude 30°31'04", Longitude 91°13'01")
 Flow: intermittent
 Discharge Route: directly to the Mississippi River

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Outfall 006

Discharge Type: boiler blowdown
Treatment: none
Location: at the point of discharge from the blowdown line
(Latitude 30°31'04", Longitude 91°12'54")
Flow: 60 gpd
Discharge Route: directly to the Mississippi River

Outfall 007

Discharge Type: once-through non-contact cooling water
Treatment: none
Location: at the point of discharge from the vacuum pump
(Latitude 30°31'04", Longitude 91°12'56")
Flow: intermittent
Discharge Route: directly to the Mississippi River

Outfall 008

Discharge Type: treated sanitary wastewater
Treatment: sewage treatment plant
Location: at the point of discharge from the sewage treatment
plant servicing the office (Latitude 30°31'06",
Longitude 91°13'02")
Flow: 300 gpd
Discharge Route: directly to the Mississippi River

Outfall 009

Discharge Type: dry dock ballast water
Treatment: none
Location: at the point of discharge from Dry Dock #1
(Latitude 30°30'45", Longitude 91°13'38")
Flow: 200,000 gpd
Discharge Route: directly to the Mississippi River

Outfall 010

Discharge Type: dry dock ballast water
Treatment: none
Location: at the point of discharge from Dry Dock #4
(Latitude 30°30'47", Longitude 91°13'38")
Flow: 175,000 gpd
Discharge Route: directly to the Mississippi River

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Outfall 011

Discharge Type: dry dock ballast water
Treatment: none
Location: at the point of discharge from Dry Dock #3
(Latitude 30°30'44", Longitude 91°13'49")
Flow: 88,000 gpd
Discharge Route: directly to the Mississippi River

Outfall 012

Discharge Type: hydrostatic test wastewater
Treatment: none
Location: at the point of discharge from the tank or pipeline
being tested (Latitude 30°30'44", Longitude 91°13'49")
Flow: varies and is intermittent
Discharge Route: directly to the Mississippi River

Outfall 013

Discharge Type: dry dock ballast water
Treatment: none
Location: at the point of discharge from Dry Dock #2
(Latitude 30°30'47", Longitude 91°13'38")
Flow: 44,000 gpd
Discharge Route: directly to the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River

BASIN AND SEGMENT - Mississippi River Basin, Segment 070201

DESIGNATED USES - a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

Changes from Previous Permit:

1. Outfall 013 has been added discharging dry dock ballast water from Dry Dock #2.
2. The effluent limitations for Outfalls 007 and 012 have been updated to reflect current permitting practices for these types of wastewaters.

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3. Outfalls 005A and 005B have been changed to Outfall 05A and 05B respectively.

6. COMPLIANCE HISTORY/COMMENTS

A. Compliance History

The most recent inspection of the facility was conducted on April 10, 2006 to assess damage from Hurricane Katrina. No damage was found.

B. DMR Review/Excursions

DMR's were reviewed for the last two years. All DMR's were sent in accordance with the current permit and no excursions were found.

7. EXISTING EFFLUENT LIMITS

Outfalls 004 and 008 - treated sanitary wastewater

| Parameter | LPDES | |
|----------------|-----------------------------------|-----------------------------------|
| | Monthly Average | Weekly Average |
| Flow - mgd | Report 1/6 mos Est. | Report 1/6 mos Est. |
| BOD | --- | 45 mg/L 1/6 mos Grab |
| TSS | --- | 45 mg/L 1/6 mos Grab |
| Fecal Coliform | --- | 400 col/100 mL 1/6 mos Grab |
| pH | 6.0 - 9.0 s.u. 1/6 mos Grab | |

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Outfalls 005A - incoming ballast water from customer barges

| Parameter | LPDES | |
|--------------|----------------------------------|----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/week Est. | Report 1/week Est. |
| COD | --- | 250 mg/L 1/week Grab |
| Oil & Grease | --- | 15 mg/L 1/week Grab |
| pH | 6.0 - 9.0 s.u. 1/week Grab | |

Outfalls 005B - maintenance ballast water

| Parameter | LPDES | |
|--------------|-----------------------------------|-----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/month Est. | Report 1/month Est. |
| COD | --- | 250 mg/L 1/month Grab |
| Oil & Grease | --- | 15 mg/L 1/month Grab |
| pH | 6.0 - 9.0 s.u. 1/month Grab | |

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Outfall 006 - boiler blowdown

| Parameter | LPDES | |
|-------------------------|-----------------------------------|-----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/month Est. | Report 1/month Est. |
| Total Residual Chlorine | --- | 0.2 mg/L 1/month Grab |
| pH | 6.0 - 9.0 s.u. 1/month Grab | |

Outfall 007 - once-through non-contact cooling water

| Parameter | LPDES | |
|-------------------------|--------------------------------------|------------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/3 months Est. | Report 1/3 months Est. |
| TOC (net) | --- | 5 mg/L 1/3 months Grab |
| Total Residual Chlorine | --- | Report 1/3 months Grab |
| Temperature | --- | Report 1/3 months Grab |
| pH | 6.0 - 9.0 s.u. 1/3 months Grab | |

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Outfalls 009, 010, and 011 - dry dock ballast water

| Parameter | LPDES | |
|--------------|-----------------------------------|-----------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/month Est. | Report 1/month Est. |
| COD | --- | 250 mg/L 1/month Grab |
| Oil & Grease | --- | 15 mg/L 1/month Grab |
| pH | 6.0 - 9.0 s.u. 1/month Grab | |

Outfall 012 - hydrostatic test water

| Parameter | LPDES | |
|--------------|----------------------------------------|-----------------------------------------|
| | Monthly Average | Daily Maximum |
| Flow - mgd | Report 1/prior to discharge Est. | Report 1/prior to discharge Est. |
| TSS | --- | 90 mg/L 1/prior to discharge Grab |
| Oil & Grease | --- | 15 mg/L 1/prior to discharge Grab |
| TOC | --- | 50 mg/L 1/prior to discharge Grab |
| pH | 6.0 - 9.0 s.u. 1/month Grab | |

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8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070201 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

10. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to revoke and reissue a permit for the discharge described in the application.

11. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

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Rationale for T.T. Barge Services Mile 237, LLC

1. Outfalls 004 and 008 - treated sanitary wastewater (estimated flows are as follows: Outfall 004 - 1000 gpd and Outfall 008 - 300 gpd)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Weekly Avg | <u>Reference</u> |
|------------------|-----------------------------------------|------------------|
| Flow | Report:Report | * |
| BOD | ---:45 mg/L | * |
| TSS | ---:45 mg/L | * |
| Fecal Coliform | ---:400 col/100 mL | * |
| pH | 6.0 - 9.0 s.u. | * |

Treatment: sewage treatment plant

Monitoring Frequency: 1/6 months at the point of discharge from either sewage treatment plant

***Limits Justification:** LAG480000, Schedule A, BPJ, and previous permit

2. Outfall 05A - incoming ballast water from customer barges (estimated flow is intermittent)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| COD | ---:250 mg/L | * |
| Oil & Grease | ---:15 mg/L | * |
| pH | 6.0 - 9.0 s.u. | * |

Treatment: none

Monitoring Frequency: 1/week at the point of discharge from the customer barges

***Limits Justification:** BPJ, previous permit, and similar outfalls

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3. **Outfall 05B - maintenance barge ballast water** (estimated flow is intermittent)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| COD | ---:250 mg/L | * |
| Oil & Grease | ---:15 mg/L | * |
| pH | 6.0 - 9.0 s.u. | * |

Note: Volume and sheen must be recorded for all discharges. (See Part II, Paragraph N)

Treatment: none

Monitoring Frequency: 1/discharge event at the point of discharge from the maintenance barges. Note: COD, oil & grease, and pH are only required if a visible oil sheen is present

***Limits Justification:** BPJ, previous permit, and similar outfalls

4. **Outfall 006 - boiler blowdown** (estimated flow is 60 gpd)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| TRC | ---:0.2 mg/L | * |
| pH | 6.0 - 9.0 s.u. | * |

Treatment: none

Monitoring Frequency: 1/month at the point of discharge from the blowdown line

***Limits Justification:** BPJ, previous permit

5. **Outfall 007 - once-through non-contact cooling water** (estimated flow is intermittent)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| TOC (net) | ---:5 mg/L | * |
| TRC | ---:0.2 | * |
| Temperature | ---:Report | * |
| pH | 6.0 - 9.0 s.u. | * |

Treatment: none

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Monitoring Frequency: 1/month at the point of discharge from the vacuum pump

***Limits Justification:** LAG480000, Schedule E; BPJ; and similar outfalls

6. Outfalls 009, 010, 011, and 013 - dry dock ballast water (estimated flow are as follows: Outfall 009 - 200,000 gpd, Outfall 010 - 175, 000 gpd; and Outfall 011 - 88,000 gpd; and Outfall 013 - 44,000 gpd)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| COD | ---:250 mg/L | * |
| Oil & Grease | ---:15 mg/L | * |
| pH | 6.0 - 9.0 s.u. | * |

Treatment: none

Monitoring Frequency: 1/month at the point of discharge from the various dry docks

***Limits Justification:** BPJ, previous permit, and similar outfalls

7. Outfall 012 - hydrostatic test wastewater (estimated flow varies and is intermittent)

| <u>Pollutant</u> | <u>Limitation</u> Mo. Avg:Daily Max | <u>Reference</u> |
|------------------|----------------------------------------|------------------|
| Flow | Report:Report | * |
| TSS | ---:90 mg/L | * |
| Oil & Grease | ---:15 mg/L | * |
| TOC | ---:50 mg/L | * |
| Benzene | ---:50 µg/L | * |
| Total BTEX | ---:250 µg/L | * |
| Lead | --- 50µg/L | * |
| pH | 6.0 - 9.0 s.u. | * |

Note: Sampling for Benzene, Total BTEX, and Lead is only required for tanks and pipelines that are not new.

Treatment: none

Monitoring Frequency: 1/prior to proposed discharge at the point of discharge from the tank or pipeline being tested

***Limits Justification:** BPJ; LAG480000, Schedule D; and similar outfalls

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BPJ Best Professional Judgement
su Standard Units

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4499 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." This facility does have equipment cleaning operations.

The SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Part II of the permit).

TMDL/303(d)WATERBODIES

The discharges from T.T. Barge Services Mile 237 are to the Mississippi River, Subsegment 070201 of the Mississippi River Basin. Subsegment 070201 is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.